

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION

LINDELL JERMYAL STOKES and
WENDY LARANA PERKINS, Individually
And as Parents and Next Friends of J.M.S., a
Minor, and J.M.S., by and through his Parents
And Next Friends, Lindell Jermyal Stokes and
Wendy Larana Stokes

PLAINTIFFS

VS.

CIVIL ACTION NUMBER 3:23-cv-524-HTW-LGI

VICTORIA LUCKY, MISSISSIPPI
DEPARTMENT OF CHILD PROTECTIVE
SERVICES; ANDREA SANDERS, as
COMMISSIONER OF MISSISSIPPI
DEPARTMENT OF CHILD PROTECTIVE
SERVICES IN HER OFFICIAL CAPACITY;
CITY OF FLOWOOD, MISSISSIPPI; CHRIS
BOWERS, INDIVIDUALLY AND IN HIS
OFFICIAL CAPACITY as DIRECTOR OF
PARKS AND RECREATION, CITY OF
FLOWOOD, MISSISSIPPI; MISSISSIPPI
DEPARTMENT OF CORRECTIONS;
BURL CAIN, as COMMISSIONER OF
MISSISSIPPI DEPARTMENT OF
CORRECTIONS IN HIS OFFICIAL
CAPACITY; AND ANDROUS C. ALDRIDGE

DEFENDANTS

MOTION TO WITHDRAW AS COUNSEL OF RECORD

Comes now Gerald L. Kucia and files this Motion to Withdraw as Counsel of Record for Defendants: Mississippi Department of Child Protective Services and Andrea Sanders, the Commissioner of the Mississippi Department of Child Protective Services (“these Defendants”), and in support of the same, would show unto the Court as follows:

1. Undersigned counsel, in his capacity as Special Assistant Attorney General for the State of Mississippi, entered an appearance on behalf of these Defendants in this matter.

2. Undersigned counsel would show that he has left his position in the Civil Litigation Division and will be doing no further work on this matter.

3. These Defendants will continue to be represented in this matter by Special Assistant Attorney General John P. Sneed.

4. No prejudice will occur to any of the parties if this motion is granted.

WHEREFORE, PREMISES CONSIDERED, Gerald L. Kucia respectfully requests that this Court enter an order allowing him to withdraw as counsel of record for Defendants: Mississippi Department of Child Protective Services and Andrea Sanders, the Commissioner of the Mississippi Department of Child Protective Service.

RESPECTFULLY SUBMITTED, this the 8th day of July, 2024.

MISSISSIPPI DEPARTMENT OF CHILD
PROTECTIVE SERVICES AND ANDREA
SANDERS, AS COMMISSIONER OF
MISSISSIPPI DEPARTMENT OF CHILD
PROTECTIVE SERVICES IN HER
OFFICIAL CAPACITY, DEFENDANTS

By: LYNN FITCH, ATTORNEY
GENERAL
STATE OF MISSISSIPPI

By: s/Gerald L. Kucia
GERALD L. KUCIA (MSB #8716)
Special Assistant Attorney General

OFFICE OF THE ATTORNEY GENERAL
Post Office Box 220
Jackson, Mississippi 39205-0220
Tel.: (601) 359-4223
Gerald.kucia@ago.ms.gov

*Attorney for Mississippi Department of
Child Protective Services and
Andrea Sanders, as Commissioner
Of Mississippi Department of
Child Protective Services in Her
Official Capacity*

CERTIFICATE OF SERVICE

I, Gerald L. Kucia, Special Assistant Attorney General and attorney for Defendants, Mississippi Department of Child Protective Services and Andrea Sanders, Commissioner of the Mississippi Department of Child Protective Services, in her official capacity, do hereby certify that I have this date caused to be filed with the Clerk of the Court a true and correct copy of the above and foregoing via the Court's CM/ECF filing system which sent notification of such filing to all counsel of record.

THIS the 8th day of July, 2024.

s/Gerald L. Kucia
GERALD L. KUCIA